

**MEMO ENDORSED**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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United States of America,	)	
	)	
Plaintiff,	)	<b>19-cr-00794</b>
vs.	)	
	)	
Tomer Osovitzki,	)	
	)	
Defendant.	)	

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**MOTION TO ALLOW DEFENDANT TO TRAVEL TO TORONTO CANADA FROM  
JUNE 20, 2020 THROUGH JULY 30, 2020**

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Defendant Tomer Osovitzki, by and through undersigned counsel, of the law firm of Springer & Steinberg, P.C., moves this Court for entry of an order allowing the Defendant to travel to Toronto, Canada from June 20, 2020 through July 30, 2020.

**AS GROUNDS THEREFOR**, the Defendant states as follows:

1. This is a case wherein Defendant Tomer Osovitzki has been charged with violations of federal law regarding alleged fraud and identity theft.
2. Defendant, who resides in Florida, is presently out on bond and being monitored by pre-trial services. As a condition of bond, the Defendant is not to leave the Southern District of Florida.
3. The Defendant is hoping to travel to Canada with his parents from June 20, 2020 through July 30, 2020. If permitted, the Defendant will travel with his parents and stay with them at their residence located at 21 Asner Avenue, Maple, Canada for the duration of his time outside the State of Florida.
4. The purpose of the trip is to visit the Defendant's ailing, ninety-year-old grandparents, who helped raise him.
5. Specifically, the Defendant would depart from Florida on June 20<sup>th</sup> and would first return to New York, New York on July 31<sup>st</sup>, for his next court appearance, and then return home to Florida, after attending the Status Conference scheduled at 10:00 AM on July 31<sup>st</sup>.

6. Undersigned counsel has inquired of Assistant United States Attorney Jeffrey C. Coffman, Esq. regarding this request. Mr. Coffman has advised that the government does not object to the Defendant's request.

7. The Defendant assures the Court that he will be present for his Status Conference on July 31, 2020 at 10:00 AM, in the United States District Court for the Southern District of New York.

**WHEREFORE**, and for the foregoing reasons, the Defendant prays for the relief requested, and for such other and further relief as the Court deems just and proper in the premises.

Dated: June 5, 2020

Respectfully Submitted,

/s/ Harvey A. Steinberg

Harvey A. Steinberg

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 5<sup>th</sup> day of June, 2020, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following e-mail addresses:

AUSA Jeffrey Coffman

[Jeffrey.Coffman@usdoj.gov](mailto:Jeffrey.Coffman@usdoj.gov)

/s/ Stacey Lopez

For Harvey A. Steinberg

Application GRANTED. Defendant is hereby permitted to travel from the Southern District of Florida to Toronto, Canada, from June 20, 2020, to July 30, 2020.

Dated: June 8, 2020  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE